

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

May 1, 2021

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti,
19 Cr. 374 (JMF)

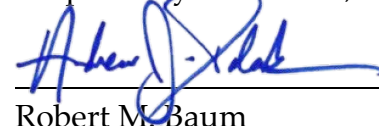
Dear Judge Furman:

I write pursuant to the Court's individual rules (Rule 10(C)) regarding the filing of redacted documents on CM/ECF. Tonight, the defense in the above-captioned case filed its omnibus pre-trial motion and seeks leave to keep Exhibits B, C, and F under seal. These exhibits contain sensitive information that is subject to the standing protective order governing the disclosure of confidential materials. Should the Court deny this application to keep the exhibits sealed in their entirety, the defense respectfully requests an opportunity to propose specific redactions for the Court's consideration.

The mere fact that the documents are subject to an agreement between the parties does not mean that they should be sealed given that they have now been filed in support of a motion and are presumably subject to the presumption in favor of public access to judicial documents. If either party believes that any of the documents should remain sealed in their entirety, that party shall file a letter brief addressing the basis for doing so by **May 7, 2021**; in the absence of such a letter brief, Defendant shall confer with the Government and, no later than **May 11, 2021**, propose specific redactions to the documents in accordance with the procedures set forth in the Court's Individual Rules and Practices. Any opposition to any

Cc: Government Counsel
request to seal or redact, by the press or otherwise, shall be filed **within two business days**. The Clerk of Court is directed to terminate ECF No. 116. SO ORDERED.

Respectfully Submitted,



Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Counsel for Michael Avenatti



May 3, 2021